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United States District Court
Southern District of Texas
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

NOV 30 2000

Michael N. Milby
Clerk of Court

EDWARD ALCALA, et al.,

§ CIVIL ACTION NUMBER

Plaintiffs,

§ B-96-203

vs.

ALEX PEREZ, in his official capacity as
Sheriff of Cameron County, Texas and
Cameron County, Texas,

Defendants.

§

**PLAINTIFFS' RESPONSE TO DEFENDANT CAMERON COUNTY'S
MOTION FOR PARTIAL SUMMARY JUDGMENT
ON STATUTE OF LIMITATIONS**

Plaintiffs hereby respond to defendant Cameron County's motion for partial summary judgment on statute of limitations and in support thereof would respectfully show the following:

1. Defendant Cameron County has filed a motion for summary judgment as to seventeen of the consent plaintiffs in the above entitled cause claiming that they were all terminated prior to November 7th, 1993 which would be the beginning of the three year statute of limitations based upon the plaintiffs' filing date of November 8th, 1996.
2. As to these plaintiffs who terminated their employment with the County prior to November 8th, 1993, plaintiffs know of no genuine issue of material fact to dispute the defendant's allegations.

Respectfully submitted,

BY James A. Herrmann

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CERTIFICATE OF SERVICE

I, JAMES A. HERRMANN, do hereby certify that on this the 28th day of November, 2000, I caused to be mailed a true and correct copy of Plaintiffs' Response to the Defendant Cameron County's Motion for Partial Summary Judgment on Statute of Limitations to defendants' attorney of record:

Mr. Richard O. Burst
Legal Division Commissioners' Court
964 E. Harrison St.
Brownsville, TX 78520


JAMES A. HERRMANN